



GOVERNOR TERRY E. BRANSTAD
LT. GOVERNOR KIM REYNOLDS

ELIZABETH S. JACOBS, CHAIR
DARRELL HANSON, BOARD MEMBER
SWATI A. DANDEKAR, BOARD MEMBER

November 7, 2012
File: E-20994, Amendment 10

Brown, Winick, Graves, Gross, Baskerville and Schoenebaum, P.L.C.
Attn.: Leanna D. Whipple
666 Grand Avenue, Suite 2000
Des Moines, IA 50309

Dear Ms. Whipple:

On August 30, 2012, in compliance with Iowa Code chapter 478, you filed with the Iowa Utilities Board, on behalf of ITC Midwest LLC (ITC), a petition for amendment of electric franchise to rebuild of 4.93 miles of existing 34.5 kV nominal voltage electric transmission line to 69 kV in Linn County, Iowa using the abbreviated franchise process. The petition has been assigned to Docket No. E-20994, Amendment 10 (AM10); please identify this filing by this docket number in all future communications.

Staff review of the petition has identified several deficiencies, which must be corrected for processing to continue.

1. The Petition

a. Page 1, 1st paragraph, line 9, at the end of line, you indicated the proposed line of 4.93 miles which found not proper. Please refer to comments in Exhibit A below, review and revise (if necessary).

b. Page 1, 2nd paragraph, line "a." where you have indicated 77.57 miles of existing line capable of operating at a maximum voltage of 36,230 V. By the time of this Amendment 10 being filed, Amendments 7 and 8 were approved and issued. Therefore, by taking consideration of both Amendments 7 and 8, the mileage of line "a." would be 77.12 miles. Please correct. Second, then line "b.", the mileage would be 70.41 miles, not 69.40 miles. Please also correct.

2. Exhibit A

a. The header (in bold print). For clarity and consistency, we suggest to add another line (at the top of said header) indicating "**EXHIBIT A**".

- b. Top paragraph, lines 6 and 7, you did not specify what the mileage of the proposed line's first segment. Please indicate for clarity and consistency. Second, line 6, in the middle of line, you indicated the petitioned line continuing south-southwesterly on private right-of-way which found not consistent with the record of E-20994, Exhibit A, page 3, paragraph C-3.2, lines 22 to 24 (on public right-of-way). Please review, explain, and revise (if necessary).
- c. Top paragraph, lines 8 thru 13, you indicated the next two segments of proposed line to be 0.22 mile and 0.11 mile which added up to 0.33 mile. However, the record of E-20994, Exhibit A, paragraph C-3.2, page 3, lines 24 and 25, and page 4, line 1, indicate that to be 0.5 mile. Please explain and revise as necessary.
- d. Top paragraph, line 17. By referring to the record of E-20994, and of this amendment Exhibit B, for accuracy and consistency, we suggest line 17 to be revised as "of the Cedar Valley Nature Trail across the East Half **of the Southeast Quarter** of Section 29, the East Half **of the East Half** of Section 32".
- e. Top paragraph, line 18, you indicated the proposed line going thru the Southwest Quarter of the Southwest Quarter of Section 33, which found not proper. Please see Exhibit B as well as the record of E-20994, and revise by removal of such quarters of Section 33, or otherwise explain.
- f. Top paragraph, line 19, at the end of line, you indicated a total mileage of 2.14 miles which found not proper. Please refer to comments of 2.b. and 2.c. above, and correct the mileage.
- g. What about the mileage of a line tap to Linn County Rural Electric Cooperative substation near the south line of Section 9, T84N, R7W. See records of E-22047, E-20994 and Exhibit B, and revise.
- h. Last line, total mileage of 4.93 miles. Please refer to comments mentioned above, and correct the mileage.

3. Exhibit B

- a. Section 33, T85N, R7W, NW1/4 of NW1/4, you indicated Otter Rd. which found not correct. Please correct the street name.
- b. Section 9, T84N, R7W, SW1/4. By referencing the previous approved franchise of docket E-22047, and by aerial photo there found an existing substation in the area. See 199 IAC 11.2(3)"b"(3) and comments in 2.g. above, please indicate such substation.
- c. The Legend, 1st line symbol's definition. For clarity, we suggest it to be revised as "Proposed 69 kV **Line Franchise** Upgrade (Existing ...)".

- d. The Legend, 2nd line symbol's definition. For clarity and consistency, please revise as "12.5 kV 3-phase **Line**".
4. Exhibit C – Segment 1 of 3 (with 161 kV line as double circuit)
- a. Page 1, line 13, 2nd filled-in blank (conductor size). For clarity and consistency, we suggest a removal of the capital letter T.
- b. Structure drawing 16169DD2V5S-T477-T4OF, the detail of "Shield Wire Level", you indicated "Existing Shield Wire" which found not proper. Please revise.
5. Exhibit C – Segment 2 of 3 (without underbuild (ub) or 2nd transmission circuit)
- a. Page 1, line 3, segment's mileage of 3.05 miles. By comments of 2.b. (1st comment), 2.c. and 2.g. above, please review and revise the mileage (if necessary), or explain.
- b. Page 1, line 4, for clarity and consistency, please add commas (,) in between "T84N" and "R7W", and in between "T85N" and "R7W". Second, please refer to Exhibit B and comment of 2.e. above, and revise by removal of Section 33.
- c. Page 1, line 13, 2nd filled-in blank. See 4.a. above and revise.
- d. Page 3, lines 54 and 55, the far left column found not proper (as if line 44 was "N/A"). See Exhibit C Instructions (on our web site), and revise.
- e. Section 29, T85N, R7W, NE1/4, between Lafayette Rd. and 1st existing pole north of Lafayette Rd., our field inspection has reported an old semi-trailer (without tires) located underneath the proposed line. Please consider this semi-trailer as building/shed located underneath a power line, and provide all related drawings (including Plan & Profile if available) for clearance verification.
- f. Section 29, T85N, R7W, either NE1/4 or SE1/4, and just south of Lafayette Rd., field inspection has found a garage and a storage shed/building located close to the proposed line. Please provide all related drawings (but not limited to Plan & Profile if appropriate and available) for clearance verification.
6. Exhibit C – Segment 3 of 3 (with 12.5 kV ub)
- a. Page 1, line 4. Similar to 5.b. above, please add a comma in between township and range.
- b. Page 1, line 13, 2nd filled-in blank. See 4.a. above, and revise.

- c. Page 1, lines 16 thru 22, 2nd column from right, the indicated information found not consistent with Exhibit C, Segment 3, page 3, line 58, and there found no angle structure drawing. Please revise or explain.
- d. Page 2, line 24 and line 25 (the last filled-in blank (Length)). Are they reflecting the actual engineering of the proposed line segment (0.12 mile long which is approximately 3 spans)? Please revise (if applied).
- e. Field inspection has reported transmission switches located on the 2nd pole south of Interstate Power and Light Company (IPL) Lafayette Substation. Are the existing switches 69 kV standard? If not, then assuming them to be replaced. Please provide new switch structure drawing(s).
- f. Underbuild drawing 25UCF3O.dgn. Is the pin insulator (used as jumper insulator) as same as the one being used in the drawing of 25 UTDF3O.dgn (a conductor separation along pin insulator, found different in the two drawings)? Please revise or explain.

7. Exhibit D

Page 1, the bold print part (at the bottom of page), line 2 (Franchise No.). For clarity, please revise as "16945, **Reference of Exhibit A, line segment C-3.2**".

8. Exhibit F

- a. Section 28, T85N, R7W, NW1/4, field inspection has found underground (ug) communication cable markers between IPL Lafayette Substation and 1st pole south of said substation. By 199 IAC 11.2(3)"f", please identify its ownership in the Exhibit F's Utilities mailing list, send a notification letter to such company, and provide this office a copy of sent letter. Second, near the same area, there found markers of Farmers Mutual Telephone Company. Please address 199 IAC 11.2(3)"f" as well. Third, field inspection has indicated an existing east-west one-phase distribution line crossing underneath the proposed line (on East Otter Rd.). Please address according to 199 IAC 11.2(3)"f". Fourth, there found Alliant Energy underground pipeline markers east and west of Cedar Valley Nature Trail (crossing by the proposed line). Please address.
- b. Section 29, T85N, R7W, NE1/4, north side of Lafayette Rd., field inspection has found telephone pedestals located east and west of the proposed line (indicating some ug communication cable crossing by the proposed line). By 199 IAC 11.2(3)"f", please address similar to 8.a. above. Second, there also found an existing east-west single phase distribution line along Lafayette Rd. north side, crossing underneath the petitioned line. Please address according to 199 IAC 11.2(3)"f".

c. Section 9, T84N, R7W, SW1/4, and along the north side of County Home Rd., there found double 12.5 kV overhead distribution lines (full 3-phase 12.5 kV at top, and V-phase 12.5 kV at bottom), and MCI ug fiber optic cable markers, indicated such utility lines crossing by the petitioned line. Similar to the above, see 199 IAC 11.2(3)"f" and address properly.

9. Exhibit G

a. A noticed letter to property owners, page 1, the header, you indicated 4.93 miles. However, referring to comments above, please revise the total mileage.

b. A noticed letter to property owners, page 2, at the top of page, we have found 4.93 miles. See 9.a. above, and revise or explain.

c. Please provide a map that being sent along with the noticed letter (it is a part of Exhibit G) even if it was Exhibit B map.

10. Safety and Route

No further comments or questions other than the ones mentioned above. We will notify you at a later time if there were any further questions or concerns.

If you have any questions, feel free to contact me at 515-725-7339 or at bao.nguyen@iub.iowa.gov

Sincerely,

/s/ Bao Nguyen

Bao Nguyen
Utilities Regulation Engineer
Safety and Engineering Section